

OUTTEN & GOLDEN LLP

Adam T. Klein
Molly A. Brooks
Sandra E. Pullman
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000

GOTTLIEB & ASSOCIATES

Jeffrey Gottlieb
Dana Gottlieb
150 East 18th Street, Suite PHR
New York, New York 10003
Telephone: (212) 228-9795

KLAFTER OLSEN & LESSER

Seth R. Lesser
Fran L. Rudich
Michael J. Palitz
Mark W. Gaffney
Two International Drive, Suite 350
Rye Brook, New York 10573
Telephone: (914) 934-9200

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MANI JACOB and LESLEENA MARS,
individually and on behalf all others similarly
situated,

Plaintiffs,

v.

DUANE READE, INC. and DUANE READE
HOLDINGS, INC.,

Defendants.

11 Civ. 0160 (JPO) (JCF)

**PLAINTIFFS' NOTICE OF
MOTION FOR CLASS CERTIFICATION
AND APPOINTMENT OF CLASS COUNSEL**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of its Motion for Class Certification and Appointment of Class Counsel, and in the Declaration of Molly A. Brooks and the exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) Certifying the proposed Class pursuant to Fed. R. Civ. P. 23(a) and (b)(3); and

(2) Appointing Plaintiffs' Counsel as Class Counsel.

Dated: New York, New York
August 31, 2012

Respectfully submitted,

OUTTEN & GOLDEN LLP
By:

/s/ Adam T. Klein
Adam T. Klein

Adam T. Klein
Molly Brooks
Sandra E. Pullman
OUTTEN & GOLDEN LLP
3 Park Avenue, 29th Floor
New York, New York 10016
Telephone: (212) 245-1000

Seth R. Lesser
Fran L. Rudich
Michael J. Palitz
Mark W. Gaffney
KLAFTER, OLSEN & LESSER LLP
Two International Drive, Suite 350
Rye Brook, New York 10573
Telephone: (914) 934-9200

Jeffrey Gottlieb
Dana Gottlieb
GOTTLIEB & ASSOCIATES
150 East 18th Street, Suite PHR
New York, New York 10003
Telephone: (212) 228-9795

Attorneys for Plaintiffs and the Collective Class